

Exhibit G

to Movant's Motion to Quash

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF FLORIDA

3 CASE NO. 1:20-CV-30961-KMW

4
5 SILVA HARAPETI, and other
6 similarly situated individuals,

7 Plaintiff,

8 vs.

9 CBS TELEVISION STATIONS, INC.,
10 and CBS BROADCASTING, INC.,
Defendants.

_____ /

11
12 Zoom Virtual Deposition
13 Tuesday, 10:00 a.m. to 1:37 p.m. [CDT]
14 July 6, 2021

15 DEPOSITION OF ELIZABETH MARY ROLDAN
16
17
18

19 Taken on behalf of the Plaintiff before
20 Nancy Gilbert, FPR, NCRA-certified stenographic
21 reporter, RPR, RMR, RDR, CRR, and Notary Public in
22 and for the State of Florida at Large, pursuant to
23 Notice of Taking Deposition and Supreme Court of
24 Florida Administrative Orders re: remote Notary
25 swearing of witnesses.)

1 APPEARANCES (All Appearing Remotely):

2
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(Present in conference room with witness)

26
27 ALSO PRESENT:

28 SILVA HARAPETI

29 MICHELLE VACHRIS, ESQUIRE

30 In-House Counsel

31 CBS Broadcasting, Inc.

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1 Thereupon:

2 (The witness is appearing from her office
3 location in Houston, Texas, along with Mr. Benjamin
4 Davis, and agreed to being sworn by Florida Notary.)

5 CERTIFIED REPORTER: Good morning. I am
6 Nancy Gilbert, the court reporter.

7 Pursuant to the current Florida Supreme
8 Court Administrative Order regarding remote
9 swearing in of witnesses, the parties will
10 stipulate that the court reporter may swear in
11 the witness via the Zoom virtual deposition,
12 and that the witness has verified her identity
13 as Elizabeth Roldan by displaying her
14 photographic identification for the Notary
15 Public, her State of Florida driver's license.

16 Starting with the noticing counsel,
17 would the attorneys please state your name and
18 so stipulate, and then I will swear in the
19 witness.

20 MR. HOOGERWOERD: Peter Hoogerwoerd for
21 plaintiff, Silva Harapeti. So stipulated.

22 MR. ROBINSON: Blair Robinson for the
23 defendant. And I'm joined by my client,
24 Michelle Vachris, from CBS.

25 CERTIFIED REPORTER: Ms. Roldan, would

1 you please raise your right hand.

2 Do you solemnly swear the testimony you
3 are about to give in this case will be the
4 truth, the whole truth, and nothing but the
5 truth?

6 THE WITNESS: I do.

7 CERTIFIED REPORTER: Thank you.

8 MR. ROBINSON: And, Peter, one quick
9 clarifying question.

10 We're not on -- we're not doing video,
11 right? I just wanted to confirm.

12 MR. HOOGERWOERD: No.

13 MR. ROBINSON: Okay. Thank you.

14 MR. HOOGERWOERD: Do you want me to do a
15 video?

16 MR. ROBINSON: No. It wasn't noticed
17 for video, but I never can tell on Zoom, so I
18 just wanted to make sure.

19 MR. HOOGERWOERD: Right. Yeah. Okay.
20 No video for today.

21 Thereupon:

22 ELIZABETH MARY ROLDAN
23 was called as a witness and, having been first duly
24 sworn and responding, "I do," was examined and
25 testified as follows:

1 DIRECT EXAMINATION

2 BY MR. HOOGERWOERD:

3 Q. Good morning, Ms. Roldan. I'm Peter
4 Hoogerwoerd. I represent Silva Harapeti in a lawsuit
5 against CBS Television stations.

6 How are you today?

7 A. I'm okay. Thank you.

8 Q. Thank you for being here.

9 I know we had some planning issues to get
10 your deposition scheduled, so I appreciate you being
11 here today.

12 Have you ever had your deposition taken
13 before, ma'am?

14 A. No, sir.

15 Q. All right. So there are some ground rules
16 here because we have a court reporter here today.
17 She's supposed to take everything that we say down.
18 Because we're conducting this proceeding remotely,
19 over Zoom, even more so do we need to avoid speaking
20 over each other.

21 So please wait for me to finish my
22 question, my sentence, and I'll wait for you to
23 finish your answer. In that way, it's easier for us
24 to get a clear record. Okay?

25 A. (Nodding head)

1 A. Robert Springer, the general manager.

2 Q. Is KHOU affiliated with CBS Television in
3 any fashion?

4 A. It's an affiliate of CBS.

5 Q. What does that mean?

6 A. It runs CBS Television programming.

7 Q. So previously to your role at KHOU, were
8 you employed by CBS Television Stations?

9 A. Yes, I was.

10 Q. Where were you employed?

11 A. WFOR.

12 Q. How long did you hold that position?

13 A. I held two positions while at WFOR. So,
14 which one?

15 Q. I'm sorry. Yeah, that's me trying to get
16 through this faster than I need to.

17 What was your position or your positions
18 with WFOR?

19 A. I held two. I began my tenure there as
20 the executive producer of special projects. And my
21 second position was news director.

22 Q. When did you hold the position of news
23 director?

24 A. From November of 2011 until December of
25 2020.

1 Q. And can you just describe for me what your
2 job duties were as news director from November of
3 2011 to December of 2020?

4 A. I was the manager in charge of the news
5 department, department head in charge of all of the
6 journalism that was coming out of the newsroom, and
7 in general, its people.

8 Q. And you held that position until December
9 of 2020?

10 A. Yes, sir.

11 Q. Why did you leave?

12 A. I got a new opportunity at KHOU.

13 Q. Were you terminated?

14 A. No, sir.

15 Q. Did you resign?

16 A. Yes, I did.

17 Q. Was there any agreement that you were
18 required to sign as part of that termination or
19 separation?

20 A. None.

21 Q. There was no severance?

22 A. Severance? No, I resigned.

23 Q. Severance payments.

24 When did you start looking for your new
25 work at KHOU?

1 A. I don't know that I was actually looking.
2 I think it fell into my lap. Sometime in 2020.

3 Q. When you say the position at KHOU fell
4 into your lap in 2020, what does that mean?

5 A. It means that I wasn't actively searching
6 for a job. I happened to notice that they were
7 looking for a news director in Houston, much by
8 happenstance.

9 Q. When you say "happenstance," did somebody
10 tell you KHOU was looking for a news director?

11 A. No, I happened to see a post.

12 Q. Where did you see the post?

13 A. On LinkedIn.

14 Q. But you were not actively looking at the
15 time?

16 A. No, sir.

17 Q. So your testimony prior, you say that
18 you're the manager in charge of the news department
19 at WFOR and you were responsible for news and, in
20 general, people.

21 A. (Nodding head)

22 Q. Can you unpackage that for me a little
23 bit? When you say that you're the manager of the
24 news department, what are your job duties? Or what
25 were your job duties from 2011 until 2020? Did they

1 employment with WFOR?

2 A. No, I don't recall.

3 Q. Did you ever have any conversations with
4 David Friend regarding recruiting talent for WFOR
5 during your employment with WFOR?

6 A. Any type of talent?

7 Q. Do you understand my question?

8 MR. ROBINSON: Yes, I think she asked
9 you a question back.

10 BY MR. HOOGERWOERD:

11 Q. All right.

12 MR. ROBINSON: I think she was seeking
13 clarification, Peter, from you.

14 THE WITNESS: (Nodding head)

15 BY MR. HOOGERWOERD:

16 Q. Well, tell me what you mean by "any kind
17 of talent." Why is that a question?

18 A. There are different jobs. There is
19 reporting and there is anchoring. So I would like to
20 know which one you are referencing specifically so I
21 can answer properly.

22 Q. All right. Well, my question was
23 generally. Did you ever speak to David Friend about
24 recruiting talent for WFOR-TV?

25 MR. ROBINSON: Peter, she has asked you

1 a clarifying question.

2 MR. HOOGERWOERD: And I think my
3 question is perfectly clear.

4 MR. ROBINSON: I understand that you
5 don't want to answer, but the witness sought
6 clarification. As you instructed her in the
7 beginning, you said, "If you don't understand
8 my question and you need clarification, you
9 can seek it." That's all she has done.

10 BY MR. HOOGERWOERD:

11 Q. Generally speaking, did you ever speak to
12 David Friend about recruiting talent for WFOR-TV?

13 MR. ROBINSON: You can answer, Liz, in
14 any way you would like.

15 THE WITNESS: Thank you.

16 Generally speaking, yes.

17 BY MR. HOOGERWOERD:

18 Q. Next question. Under what circumstances
19 did you speak with David Friend about recruiting
20 talent for WFOR-TV?

21 A. I would speak specifically with David
22 about recruiting anchors for WFOR.

23 Q. Other than anchors, did you ever speak
24 with David Friend about recruiting any other kind of
25 talent for WFOR?

1 A. Executive producers, yes.

2 Q. Anything else? Any other category of
3 employee, or worker, reporter, that you spoke to
4 David Friend about in terms of recruiting talent for
5 WFOR-TV?

6 A. On occasion, reporters.

7 Q. Under what circumstances would you speak
8 to David Friend about recruiting reporters for
9 WFOR-TV?

10 A. If there was someone within the
11 CBS-owned-and-operated group that was looking for
12 movement that we wanted to review tapes on. "Tapes"
13 being their stories.

14 Q. Ms. Roldan, you previously testified that
15 if somebody wanted to apply for a full-time position,
16 anybody could apply for a full-time position as a
17 reporter, right?

18 A. (Nodding head)

19 Q. And you're shaking your head. You have to
20 say yes or no.

21 A. I was waiting for the question. Yes.

22 Q. So the review of tapes for, I guess,
23 another reporter within the O & O system, would those
24 people have applied already for the position or would
25 you be actively looking to recruit those individuals

1 to work at WFOR?

2 A. It could vary. But, ultimately, they
3 would -- It could vary.

4 Q. And "ultimately, they could" what?

5 A. Anybody could apply.

6 Q. At what point would the application be
7 requested from the potential recruit that you would
8 be discussing with David Friend for WFOR? Object to
9 form. Assumes facts not in evidence. Misstates the
10 testimony.

11 You can answer, if you can.

12 THE WITNESS: Can you repeat the
13 question, please?

14 BY MR. HOOGERWOERD:

15 Q. Sure.

16 Like, so let's say that you are looking to
17 recruit a reporter from some other O & O or
18 owned-and-operated station and you reviewed the tapes
19 for their stories, does the application come at the
20 beginning or at the end of that process?

21 A. It could come at any time.

22 Q. Could the application come after the
23 interview of the potential candidate?

24 MR. ROBINSON: Object to form. Calls
25 for speculation.

1 You can answer if you can, Liz.

2 THE WITNESS: Repeat the question again,
3 sir. I'm sorry.

4 BY MR. HOOGERWOERD:

5 Q. Sure.

6 Let's say that you found somebody that you
7 like, and you reviewed their tapes and you discussed
8 it with David Friend, could the application for the
9 full-time position with WFOR-TV come at the end of
10 that process?

11 A. The process is lengthy. It's not one
12 interview. The application process can come, the
13 actual application can come at any time during that
14 process.

15 Q. Did you discuss criteria for news
16 reporters that you would be interested in
17 interviewing with David Friend?

18 MR. ROBINSON: At any point in time?

19 MR. HOOGERWOERD: During her tenure with
20 WFOR.

21 THE WITNESS: Did I -- Repeat that
22 again. Did I discuss criteria?

23 BY MR. HOOGERWOERD:

24 Q. Yes. What kind of things would you be
25 looking for?

1 MR. ROBINSON: Well, that's a different
2 question. So which one do you want her to
3 answer, Peter?

4 MR. HOOGERWOERD: She has asked me to
5 clarify, and I think I'm clarifying
6 "criteria."

7 MR. ROBINSON: So now you're clarifying.

8 MR. HOOGERWOERD: Yes. So now let me
9 try this a third time.

10 It's not as easy as it looks,
11 Ms. Roldan. I'm sorry.

12 BY MR. HOOGERWOERD:

13 Q. Did you discuss the criteria for the news
14 reporters that you were interested in with
15 David Friend, news reporters to come to WFOR? Did
16 you discuss any kind of criteria with him, what you
17 were looking for?

18 A. Over the course of my tenure?

19 Q. Yes.

20 A. Yes. I'm sure I must have.

21 Q. Do you remember what that criteria was
22 that you discussed with David Friend for news
23 reporters to come to WFOR?

24 A. Specifically, probably shift, what shift
25 they were required to work.

1 Q. Anything else?

2 A. Probably their experience.

3 Q. Anything else?

4 A. Not that I can recall.

5 Q. Did you ever receive a directive from
6 anybody at WFOR or from CBS Television stations, a
7 directive that you needed to control the costs of
8 your news department?

9 A. A directive? Can you clarify what you
10 mean by that?

11 Q. Yes. Somebody who is in a position of
12 authority over you telling you that you needed to
13 control the costs for your department.

14 A. Not that I can recall.

15 Q. So when you are hiring a news reporter
16 full-time, is there a difference between hiring a
17 news reporter full-time as compared to a per diem
18 news reporter working for WFOR?

19 MR. ROBINSON: Object to form. Vague as
20 to "difference."

21 You can answer, if you can, Liz.

22 THE WITNESS: A difference in what way?

23 BY MR. HOOGERWOERD:

24 Q. What their job responsibilities are; what
25 their pay is; what they're supposed to do.

1 Q. Would you have corresponded with anybody
2 with regard to promoting Lauren Pastrana from
3 per diem to full-time reporter at WFOR?

4 MR. ROBINSON: Object to form. Calls
5 for speculation.

6 You can answer if you can.

7 THE WITNESS: There was paperwork that
8 was required, forms that had to be filled out.

9 BY MR. HOOGERWOERD:

10 Q. Any e-mails?

11 A. I can't say for sure.

12 Q. What paperwork or forms would you have
13 required to be filled out to promote Lauren Pastrana
14 from a per diem to a full-time news reporter?

15 A. I don't remember the exact forms, but
16 there were forms, paperwork, that you had to fill out
17 with a person's name, and whatnot.

18 Q. Did you consult with David Friend on
19 promoting Lauren Pastrana?

20 A. Not that I can recall.

21 Q. You can't say one way or another?

22 A. I -- I can say I can't remember.

23 Q. Was Lauren Pastrana's experience one of
24 the criteria that you considered in promoting her
25 from per diem to full-time?

1 BY MR. HOOGERWOERD:

2 Q. Do you think she is making it up?

3 MR. ROBINSON: Object to the form. You
4 can answer.

5 THE WITNESS: I have no idea.

6 BY MR. HOOGERWOERD:

7 Q. Was David Friend involved in your decision
8 to promote Oralía Ortega from per diem to full-time?

9 A. Not that I can recall.

10 Q. You don't know either way?

11 A. Not that I can recall.

12 Q. What about Ty Russell, was David Friend
13 involved with the decision to promote Ty Russell?

14 A. Not that I can recall.

15 Q. In your role as news director for WFOR-TV,
16 during your tenure there, you were responsible in
17 general for the content of the news?

18 A. Overall. I don't make the -- I didn't
19 make the decisions on a moment by moment.

20 Q. Your assistant news director and editorial
21 staff would have assisted you with that --

22 A. Primarily --

23 Q. -- in terms of --

24 A. Primarily the executive producers and the
25 assignment manager and the managing editor.

1 MR. ROBINSON: Object to form. Vague.

2 Calls for speculation.

3 You can answer.

4 THE WITNESS: Through regular
5 conversation. There was no formalized
6 process.

7 BY MR. HOOGERWOERD:

8 Q. Was the decision to hire news reporters
9 for WFOR-TV on a per diem basis, was that something
10 that was directed to you by corporate on an O & O
11 level?

12 MR. ROBINSON: Objection. Vague.
13 Compound. Calls for speculation.

14 You can answer, if you can.

15 THE WITNESS: Can you -- I don't --
16 I don't understand the question.

17 BY MR. HOOGERWOERD:

18 Q. Sure. Why did the category of per diem
19 news reporters exist as WFOR?

20 A. I can't say that I know exactly why. But
21 it was an opportunity to get someone hired to fill an
22 open position.

23 Q. And who created that position?

24 MR. ROBINSON: At WFOR?

25

1 BY MR. HOOGERWOERD:

2 Q. I mean, she only worked at WFOR for the
3 time period that we're talking about. Right?

4 So when you worked at WFOR, who created
5 that position?

6 A. Who created the existing per diem
7 position?

8 Q. Correct.

9 A. I'm not sure exactly who creates it.

10 Q. Would that directive have come from upper
11 management at CBS Television Stations?

12 MR. ROBINSON: Object to form. Calls
13 for speculation.

14 You can answer.

15 THE WITNESS: Not that I'm aware of.

16 BY MR. HOOGERWOERD:

17 Q. You don't know one way or the other?

18 A. I'm -- I'm not aware. I don't --

19 I just don't know.

20 Q. But you can say with certainty, whenever
21 there were a position to be filled at WFOR for a
22 per diem role, that directive would have come to you
23 from Adam Levy, correct? Adam Levy. I'm sorry. I'm
24 mispronouncing his name.

25 A. No, that's okay.

1 No, I -- I don't --

2 No, it would be the -- I would request if
3 I could fill a position.

4 And I would get -- So, as you say a
5 directive? I would make a request, and he would give
6 me the answer.

7 Q. Is that process also true for promotions
8 of per diem employees to full-time roles, such as
9 Lauren Pastrana, Oralia Ortega, and Ty Russell?

10 A. Yes.

11 Q. Did you request that from Adam Levy, and
12 he would either approve it or reject it?

13 A. I'm sure he would. Yes, that's -- Yes,
14 that's correct.

15 Q. Would any other individuals be involved in
16 that process of promoting a per diem news reporter to
17 a full-time employee?

18 A. Generally, the H.R. department at the
19 station and the controller of the station.

20 Q. But the H.R. department and controller
21 wouldn't make those management decisions, right, it
22 would be --

23 A. Right.

24 Q. -- your station management that would?

25 A. Correct. But I think you asked if others

1 were involved?

2 Q. Right. So H.R. would be involved with the
3 paperwork?

4 A. Yes.

5 Q. And the controller would be involved with
6 perhaps rates of pay?

7 A. Correct.

8 Q. Who was the controller at the time that
9 you worked for WFOR?

10 A. His name is Carl Larson.

11 And there was -- I'm sorry. There was a
12 gentleman prior to Carl, at the beginning of my time
13 at WFOR, named Randy Pringle.

14 Q. At the time that you were there, who did
15 Carl Larson report to?

16 A. I believe Adam Levy.

17 Q. Did you ever refer to news reporters as
18 talking heads?

19 A. I doubt it. I don't believe so.

20 Q. What involvement would David Friend have
21 with WFOR-TV promoting a news reporter from per diem
22 to full-time at WFOR?

23 MR. ROBINSON: Object to form. Calls
24 for speculation and assumes facts not in
25 evidence. Also, asked and answered.

1 You can answer again, Liz.

2 THE WITNESS: I think I would show a
3 reporter to David. That's about it.

4 BY MR. HOOGERWOERD:

5 Q. Did you show Lauren Pastrana to
6 David Friend?

7 A. I can't recall for sure.

8 Q. What about Oralia Ortega, did you show
9 Oralia Ortega to David Friend?

10 A. I can't recall for sure.

11 Q. What about Ty Russell, did you show
12 Ty Russell to David Friend?

13 A. I can't recall for sure.

14 Q. But, generally speaking, it's your
15 testimony here today that David Friend would be
16 involved in that hiring process?

17 MR. ROBINSON: Objection. Vague.
18 Compound.

19 You can answer.

20 THE WITNESS: No. My testimony would be
21 that I would show David the reporter.

22 BY MR. HOOGERWOERD:

23 Q. Why would you show David the reporter?

24 A. Because I wanted -- I wanted his opinion.

25 Q. Why would you want David Friend's opinion

1 on a hiring or a promotion of a news reporter?

2 MR. ROBINSON: Object to form.

3 Peter, that's not what she just said.

4 And now you're just twisting her words.

5 You can answer again. You can answer
6 again, Liz, what you said before.

7 THE WITNESS: What I said before is that
8 I would show a reporter to David.

9 BY MR. HOOGERWOERD:

10 Q. And I asked you why, and you said you
11 wanted his opinion. Why would you want his opinion?

12 A. To get a second opinion.

13 Q. So David Friend's opinion would matter to
14 you in making a hiring decision?

15 A. It could.

16 Q. And if David Friend told you to reject a
17 candidate for a full-time reporting position at WFOR,
18 would you take that advice and say: I don't like
19 this reporter, don't hire them?

20 MR. ROBINSON: Object to form. Assumes
21 facts not in evidence. Incomplete
22 hypothetical.

23 You can answer.

24 THE WITNESS: It wouldn't be that
25 simple, no.

1 BY MR. HOOGERWOERD:

2 Q. Explain to me that process.

3 A. One specifically where David didn't like
4 the talent?

5 Q. Well, you said that you would ask him for
6 and you would want his opinion as a second opinion.

7 I'm asking if he ever told you: My
8 opinion is that you should not hire that news
9 reporter or you should not promote that news
10 reporter. Would that foreclose you from hiring that
11 individual?

12 A. No, it would not. It would not.

13 Q. Who is Nick Bourne?

14 A. Nick Bourne was the assistant news
15 director at the station.

16 Q. Did Nick Bourne report to you when he was
17 working there?

18 A. Yes, sir.

19 Q. Did Nick Bourne ever tell you that Silva
20 had complained to him about being assaulted during a
21 football game?

22 A. Not that I can recall.

23 Q. What e-mails did you review today in
24 preparing for your deposition? And I don't want to
25 know about e-mails that were authored by or sent to

1 turn it over to you here in a second.

2 MR. ROBINSON: Okay.

3 (Recess taken in the proceedings 1:31
4 p.m. to 1:35 p.m. [CDT], after which the following
5 proceedings were had:)

6 MR. HOOGERWOERD: Okay. Your turn,
7 Blair.

8 MR. ROBINSON: Okay. I only have a few.

9 CROSS-EXAMINATION

10 BY MR. ROBINSON:

11 Q. Ms. Roldan, do you have any knowledge as
12 to whether Peter Dunn was consulted on any employment
13 decision involving Silva Harapeti?

14 A. No.

15 Q. Do you have any knowledge as to whether
16 David Friend was consulted on any employment decision
17 involving Silva Harapeti?

18 A. No.

19 Q. Do you have any knowledge as to Peter Dunn
20 being involved in the hiring of per diem reporters at
21 WFOR?

22 A. No.

23 Q. Do you have any knowledge of David Friend
24 being involved in the hiring of any per diem
25 reporters at WFOR?

1 A. That, I -- I don't recall that, no.

2 Q. Do you have any knowledge of Peter Dunn
3 being involved in decisions about what to pay
4 per diem reporters or producers at WFOR?

5 A. No.

6 Q. Do you have any knowledge of David Friend
7 being involved in decisions about what to pay
8 per diem reporters or producers at WFOR?

9 A. No.

10 MR. ROBINSON: Those are all the
11 questions that I have.

12 Peter, are we good, or do you have more?

13 MR. HOOGERWOERD: Yeah. I have just one
14 question.

15 REDIRECT EXAMINATION

16 BY MR. HOOGERWOERD:

17 Q. Ma'am, you testified earlier, right,
18 though, that you would consult with David Friend, you
19 would get a second opinion from him on hiring
20 decisions for full-time reporters at WFOR?

21 A. Yes. I would send him links.

22 Q. Do you know why David Friend was fired?

23 A. No, I don't. I'm not even sure he has
24 been fired.

25 Q. All right. The same question for Peter

1 Dunn, do you know why he was separated from his
2 employment?

3 A. No.

4 MR. HOOGERWOERD: All right. Read or
5 waive?

6 MR. ROBINSON: We will read.

7 MR. HOOGERWOERD: I'll order a mini, and
8 I'll send you the two exhibits, Nancy.

9 CERTIFIED REPORTER: Mr. Robinson, do
10 you want a copy?

11 MR. ROBINSON: Please. And a rough.

12 CERTIFIED REPORTER: A rough draft?

13 MR. ROBINSON: Yes.

14 (Thereupon, the taking of the deposition
15 was concluded at 1:37 p.m. Signature and
16 formalities were not waived.)
17
18
19
20
21
22
23
24
25